

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

\*\*\*\*\*  
William Soler Justice, \*  
\*  
Plaintiff, \*  
v. \* Civil No. 1:20-cv-00517-PB  
\*  
Christopher T. Sununu, et al., \*  
\*  
Defendants. \*  
\*\*\*\*\*

**MOTION TO EXTEND DEADLINE TO FILE ANSWERS**

Defendants Benjamyn Carver and Page Kimball, by and through counsel, move to extend their deadline to answer or otherwise plead by 14 days, stating as follows:

1. Per the Agreement on Acceptance of Service, Defendants Carver and Kimball must answer or otherwise plead by May 28, 2024.
2. Attorney Nathan Kenison-Marvin accepted service and filed appearances on their behalf on May 14, 2024.
3. Attorney Kenison-Marvin is currently away from the office unexpectedly and likely will be unavailable through at least the week of May 27.
4. Undersigned counsel, as chief of the Civil Litigation Unit, is reallocating resources in order to meet deadlines in this case and others.
5. In light of other competing deadlines and obligations within the Civil Litigation Unit, however, Defendants Carver and Kimball require additional time in order to file answers in this case.
6. Defendants Carver and Kimball therefore request a two-week extension of their answer deadline to June 11.

7. The defendants still anticipate meeting the June 5 deadline to produce discovery material in this case and will be prepared to participate, through counsel, in the June 11, 2024 status conference.

8. No concurrence to this motion is required in light of the plaintiff's incarcerated status. *See* LR 7.1(c).

9. It is not anticipated that the requested extension will result in the continuance of any hearing, conference, or trial. *See* LR 7.2(a)

WHEREFORE, Defendants Carver and Kimball respectfully request that this Honorable Court:

- A. Extend their answer deadlines by two weeks to June 11, 2024;
- B. Grant such other relief as the Court deems just and equitable.

Respectfully submitted,

Benjamyn Carver and Page Kimball

By their attorney,

JOHN M. FORMELLA  
ATTORNEY GENERAL

Dated: May 24, 2024

/s/ Samuel Garland  
Samuel RV Garland, Bar #266273  
Senior Assistant Attorney General  
Chief, Civil Litigation Unit  
Civil Bureau  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent by ECF to counsel of record and is being conventionally mailed to the Plaintiff at 51 Storrs St., #310, Concord, NH 03301.

Date: May 24, 2024

/s/ Samuel R.V. Garland  
Samuel RV Garland